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MEMORANDUM

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FROM: Steven M. Olea
Director
Utilities Division

DATE: July 15, 2011

RE: IN THE MATTER OF THE APPLICATION OF I-WIRELESS, LLC FOR APPROVAL
OF OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS. (DOCKET
NO. T-20538A-10-0332)

Attached is the Staff Report for i-wireless, LLC's Application for designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934 as amended. Staff recommends approval of the Application with conditions.

SMO:LLM:kdh

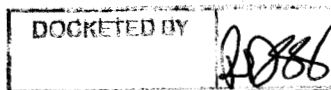
Originator: Lori Morrison

Attachment: Original and thirteen copies

Arizona Corporation Commission

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JUL 18 2011



SERVICE LIST FOR: I-WIRELESS, LLC
DOCKET NO.: T-20538A-10-0332

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STAFF REPORT
UTILITIES DIVISION
ARIZONA CORPORATION COMMISSION

I-WIRELESS, LLC
DOCKET NO. T-20538A-10-0332

IN THE MATTER OF THE APPLICATION OF I-WIRELESS, LLC FOR APPROVAL OF
OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS

JULY 15, 2011

STAFF ACKNOWLEDGMENT

The Staff Report for i-wireless, LLC, Docket No. T-20538A-10-0332, was the responsibility of the Staff member listed below. Lori Morrison was responsible for the review and analysis of i-wireless, LLC's Application for designation as an eligible telecommunications carrier for the limited purpose of offering Lifeline Service to qualified households within the State of Arizona.

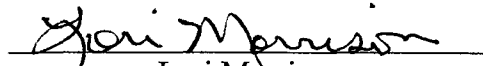

Lori Morrison
Utilities Consultant

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1. PROCEDURAL HISTORY

On August 6, 2010, i-wireless, LLC, Inc. ("i-wireless") filed a petition requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to 47 U.S.C. § 214(e)(2).

On September 15, 2010, Staff issued Staff's First Set of Data Requests ("STF 1"). i-wireless responded on January 10, 2011.

On October 14, 2010, the Arizona Local Exchange Carriers Association ("ALECA") filed a motion to intervene.

On December 7, 2010, a Procedural Order granted ALECA's request for intervention in this proceeding.

On March 4, 2011, Staff issued Staff's Second Set of Data Requests ("STF 2"). i-wireless responded on April 11, 2011.

On April 28, 2011, Staff issued Staff's Third Set of Data Requests ("STF 3"). i-wireless responded on May 9, 2011.

2. BACKGROUND

i-wireless is a North Carolina-based limited liability company, 50 percent owned by Genie Global, Inc. and 50 percent owed by The Kroger Company, with its principal office located in Newport, Kentucky. i-wireless is a reseller of commercial mobile radio service ("CMRS") throughout the United States, including the State of Arizona and has been providing wireless service in Arizona since February 2007. i-wireless provides service through a "virtual network" consisting of services obtained from Sprint PCS ("Sprint"), a licensed wireless network operator, and does not own or operate any of its own wireless facilities. i-wireless' arrangement with Sprint enables it to offer services wherever Sprint offers service in the State of Arizona. Both non-rural and rural incumbent local exchange carriers ("ILECs") provide wireline service within these areas. For its proposed designated service area, i-wireless provided a list identifying each serving ILEC, each ILEC's Study Area Code ("SAC") and identified each ILEC as being classified as Rural or Non-Rural (see Attachment 1).¹

On April 1, 2009, i-wireless petitioned the FCC seeking forbearance from the facilities-based requirements in 47 U.S.C. § 214(e)(1)(A), which requires that a carrier provide supported services, at least in part, over its own facilities to be eligible for designation as an ETC. i-wireless stated in its petition that it would meet all ETC obligations, except for the facilities-

¹ Response to Staff Data Request STF 1.4(b).

based requirements. On June 22, 2010, the FCC adopted an Order² granting i-wireless forbearance from the facilities-based requirements for Lifeline support only and subject to i-wireless meeting the following conditions:

- (1) provide its Lifeline customers with 911 and enhanced 911 ("E911") access regardless of the activation status and availability of prepaid minutes;
- (2) provide its Lifeline customers with E911-compliant handsets and replace, at no additional charge to the customer, non-compliant handsets of existing customers who obtain Lifeline-supported services;
- (3) comply with conditions (1) and (2) as of the date it provides Lifeline services;
- (4) obtain a certification from each Public Safety Answering Point ("PSAP") where i-wireless seeks to provide Lifeline service confirming that i-wireless provides its customers with 911 or E911 access or self-certify and that FCC requirements have been met³;
- (5) require each customer to self-certify at time of service activation and annually thereafter that they are the head of household and receive Lifeline-supported service only from i-wireless;
- (6) establish safeguards to prevent its customers from receiving multiple i-wireless Lifeline subsidies at the same address;
- (7) deal directly with the customer to certify and verify the customer's Lifeline eligibility; and
- (8) submit to the Wireline Competition Bureau a compliance plan outlining the measures i-wireless will take to implement these conditions.⁴

3. REQUIREMENTS FOR DESIGNATION AS AN ETC

Designation as an ETC makes a carrier eligible to receive federal universal service funds. The requirements for designation of ETCs are specified by 47 U.S.C. § 214(e)(1). It states:

² See *Federal-State Joint Board on Universal Service: In the Matter of i-wireless, LLC Petition for Forbearance from 47 U.S.C §214(e)(1)(A)*, Order, FCC 10-117, Released June 25, 2010 ("Order").

³ See *Federal-State Joint Board on Universal Service: In the Matter of i-wireless, LLC Petition for Forbearance from 47 U.S.C §214(e)(1)(A)*, Order, FCC 10-117, Released June 25, 2010 ("Order"), para 13. The FCC required if i-wireless used the self-certification option, it had four additional procedures that had to be followed.

⁴Per 6/18/2011 email received by Staff from counsel for i-wireless: "i-wireless has met with FCC staff several times in the past couple of months, and was told that they could expect approval of their compliance plan in early-to-mid July."

“A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall throughout the service area for which the designation is received: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the corresponding charges using media of general distribution.”

In order to be designated as an ETC, a carrier must offer Lifeline service to all qualifying low-income customers within its service area.⁵ Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. As a wireless reseller of prepaid wireless service, i-wireless is proposing to offer qualified customers a free handset and the choice of either free prepaid minutes or applying the Lifeline discount for any i-wireless’ monthly prepaid retail plans (excluding text only plans).⁶

As indicated above, the FCC granted i-wireless forbearance from the facilities-based requirement and any criteria related to facilities build out plans. i-wireless would be a limited ETC, eligible only for Lifeline support and must meet all the other criteria required of ETCs.

3.1 Supported Services

47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to receive Federal universal service fund support. The services include:

- (1) “Voice grade access to the Public Switched Network” is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and receive voice communications, including receiving a signal indicating there is an incoming call. For purposes of this Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- (2) “Local usage” means minutes of use for local exchange service, prescribed by the Federal Communications Commission, provided free of charge to end users;
- (3) “Dual tone multi-frequency” (“DTMF”) is a method of signaling that facilitates the transportation of signaling throughout the network, shortening call set-up time;
- (4) “Single-party service” is a telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among

⁵ 47 C.F.R. §§ 54.405 and 54.411(a)

⁶ See response to Staff Data Request LM 2.1 and Exhibit 1.

users to provide service, a dedicated message path for the length of a user's particular transmission;

- (5) "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911", to call emergency services through a Public Safety Access Point ("PSAP") operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information ("ANI"), which enables the PSAP to call back if the call is disconnected, and automatic location identification ("ALI"), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- (6) "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- (7) "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- (8) "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- (9) "Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, 'toll limitation' denotes toll blocking and toll control."⁷

i-wireless states in its application that it currently offers the services designated for support by the Federal universal support mechanisms under 47 U.S.C. § 51.101(a) as follows:

1. Voice grade access to the public switched network;
2. Local usage;
3. Dual tone, multi-frequency signaling or its functional equivalent;
4. Single party service or its functional;
5. Access to emergency services;
6. Access to operator services;

⁷ 47 C.F.R. § 54.400(d)

7. Access to interexchange service – i-wireless states customers can use its services to complete toll calls. i-wireless does not impose separate charges for interexchange calls and long distance calling is included in its service with no additional charge;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income customers – i-wireless states its wireless service is provided on a prepaid, or pay-as-you-go, basis and there is no distinction between local minutes and domestic long distance minutes. Customers also must specifically authorize access for international services, for which additional charges may apply. The nature of prepaid services eliminates the possibility for low-income customers incurring large charges for heavy toll (or other) calling and being disconnected for nonpayment.

In its application, i-wireless states it has the ability to provide all the supports services and functionalities required in the proposed ETC coverage area to all subscribers taking service under its Lifeline plan through arrangements with its underlying carriers. Based on the above information and explanations, Staff believes that i-wireless meets this requirement for ETC designation.

3.2 Advertising of Supported Services

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. In order to comply with this requirement, i-wireless states that it will advertise the availability of its supported services and the corresponding charges using media of general distribution. i-wireless states⁸ it currently markets its retail services through its Kroger-owned stores across the state of Arizona and will likewise market its Lifeline products. Its Lifeline marketing will include signage and instructional materials on end caps in each store. To reach customers who qualify for the program, information will be printed on cash register receipt for those customers who use a program qualifying method of payment (e.g., food stamps). In addition, i-wireless will also utilize direct mail, conventional advertising (e.g., radio) and non-conventional advertising (e.g., bus wraps/signage) to reach qualified customers. Further, i-wireless plans to distribute brochures at various state and local social service agencies, and intends to partner with nonprofit assistance organizations (such as Habitat for Humanity), in order to inform customers of the availability of its Lifeline services. Advertising will be in both English and Spanish. i-wireless provided samples of its printed advertisements to Staff for review.

Based on the information above and i-wireless' advertising materials provided to Staff for review, Staff concludes that i-wireless will advertise the availability of its supported services and

⁸ Response to Staff Data Request STF 1.41.

the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Staff believes that i-wireless meets this ETC designation criteria.

3.3 ETC Requirements in 47 C.F.R. § 54.202(a)(1)-(5)

In addition to the requirements listed above, on March 17, 2005, the FCC issued a Report and Order⁹ that established additional minimum criteria that all ETC applicants must satisfy in order to be granted ETC status by the FCC. These requirements were added to the FCC's rules under 47 C.F.R. § 54.202(a)(1)-(5). In this Report and Order, the FCC determined that an ETC applicant must comply with the following requirements in its application¹⁰:

3.3.1 A Commitment and Ability to Provide Supported Services

In 47 C.F.R. § 54.202(a)(1), the FCC outlines “the requirement that an ETC applicant must demonstrate its commitment and ability to provide the supported services throughout the designated service area by providing services to all requesting customers within its designated service area and by submitting a formal network improvement plan that demonstrates how universal service funds will be used to improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of high-cost support”.¹¹

i-wireless states that upon designation as an ETC, it will make available to consumers Lifeline offerings which will provide consumers with all of the functionalities and features currently provided by i-wireless to existing customers. Further, i-wireless states that it will provide Lifeline service to qualifying customers requesting these services throughout its designated service area in Arizona pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). However, i-wireless indicates in its application that the FCC waived all the facilities-based requirements for it and, as such, the additional requirement of demonstrating a commitment and ability to provide the supported services, including providing service to all customers within its proposed service area, applies to facilities-based carriers seeking high-cost universal service support and does not apply to its application.

Based on the above information, Staff believes that i-wireless meets the non-facilities based portion of this ETC designation criteria.

3.3.2 Remain Function in Emergency Situations

In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC application demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant must demonstrate that it has a reasonable amount of back-up power to ensure functionality

⁹ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“ETC Minimum Requirements Report and Order” or “Report and Order”).

¹⁰ *Ibid.*, para 20.

¹¹ *Ibid.*, para 21.

without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”¹²

To demonstrate its ability to remain functional in emergency situations, i-wireless states¹³ that it provides service in Arizona by reselling services of its underlying wireless carrier, specifically Sprint in Arizona and that Sprint, as a Tier 1 carrier, has the required capabilities in place. Therefore, through its underlying carrier(s), i-wireless states it has the ability to remain functional in emergency situations. i-wireless further states it will provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Based on the above information, Staff concludes that i-wireless has demonstrated its ability to remain functional in emergency situations by reselling the service of a carrier that utilizes state-of-the-art network reliability standards. Staff believes that i-wireless meets the ETC designation criteria.

3.3.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application. Thus, “an ETC applicant must make a specific commitment to objective measures to protect consumers. Consistent with the designation framework established in the *Virginia Cellular ETC Designation Order*¹⁴ and the *Highland Cellular ETC Designation Order*¹⁵ and as suggested by commenters, a commitment to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service will satisfy this requirement for a wireless ETC applicant seeking designation...”¹⁶ The sufficiency of other commitments will be considered on a case-by-case basis.

To demonstrate its ability to satisfy consumer protection and service quality standards, i-wireless states¹⁷ as a reseller of other carriers’ wireless services, its services are of the same quality and reliability as that of its underlying vendor. To demonstrate its commitment to high service quality, i-wireless states it will comply with the CTIA – Wireless Association®

¹² *Ibid.*, para 25.

¹³ Response to Staff Data Request STF 2.16.

¹⁴ See *Federal-State Joint Board on Universal Service; Virginia Cellular, LLC Petition for Designation as and Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, Released January 24, 2004 (*Virginia Cellular ETC Designation Order*).

¹⁵ See *Federal-State Joint Board on Universal Service; Highland Cellular, Inc. Petition for Designation as and Eligible Telecommunications Carrier for the Commonwealth of Virginia*, Memorandum Opinion and Order, CC Docket No. 96-45, Released April 12, 2004 (*Highland Cellular ETC Designation Order*).

¹⁶ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005), para 28.

¹⁷ Response to Staff Data Request STF 2.18.

Consumer Code for Wireless Service. Additionally, i-wireless provided a link to its website where it posts its Privacy Policy, which outlines i-wireless' policies on collecting and using customers' online information.

Based on the above information, Staff believes that i-wireless meets this ETC designation criteria.

3.3.4 Offer Local Usage Plan Comparable to Incumbent LECs

In 47 C.F.R. § 54.202(a)(4), the FCC requires an ETC applicant to “demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.”¹⁸ However, the FCC did not adopt a specific local usage threshold for petitioning applicants.

To demonstrate it provisions local usage comparable to that offered by the incumbent Local Exchange Carriers (“LECs”)¹⁹, i-wireless states its proposed Lifeline offering fully complies with the local usage requirements established by the FCC. Not only will i-wireless' offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. Contrary to the ILECs' plans, i-wireless will offer customers the option of a certain amount of service free of charge or a discount on its service packages. In contrast to the ILEC plans, which contain relatively small local calling areas, i-wireless customers can use these free minutes to place calls statewide (or even nationwide) because i-wireless does not constrict customers' use by imposing a local calling area requirement. In addition to free voice services, i-wireless will provide Lifeline customers with access to a variety of other features at no cost, including voice mail, caller I.D., call waiting services and E911 capabilities. Most importantly, i-wireless' Lifeline service will provide low-income Arizona residents with the convenience and security offered by wireless services-even if their financial position deteriorates.

Based on the above information, and recognizing that the FCC has not set a local usage threshold, Staff believes that i-wireless meets this ETC designation criteria.

3.3.5 Certify Requirement to Provide Equal Access

In 47 C.F.R. § 54.202(a)(5), the FCC, having determined it would not impose a general equal access requirements on ETC applications, directed ETC applicants to certify that it acknowledges that the FCC may require it “to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.”²⁰ Further, the FCC determined it would decide whether to impose any equal access requirements on a case-by-case basis.

¹⁸ *Ibid*, para 32.

¹⁹ 47 C.F.R. § 202(a)(4).

²⁰ *Ibid*, para 37.

i-wireless acknowledges²¹ that the FCC may require it to provide equal access to long distance carriers in the event no other eligible telecommunications carrier is providing equal access within the service area. Based on this response, Staff concludes this requirement has been met.

3.4 Expanded Eligibility Criteria, Dispute Resolution, Certification, Verification, Recordkeeping and Outreach

In addition to adding the above criteria applying to ETC applicants, the FCC also adopted expanded eligibility criteria for Lifeline and Link Up, dispute resolution procedure, certification procedures, verification procedures and recordkeeping procedures and outreach for ETCs. The Commission adopted these additional criteria on June 21, 2005, in Decision No. 67941.

In its application, i-wireless states it will comply with the Lifeline certification and verification requirements as set forth in 47 § 54.410. Further, in Staff DR STF1.48, Staff asked i-wireless to certify that it would comply with all the requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements set forth in ACC Decision No. 67941. i-wireless "certifies that it will comply with all the requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements in Decision No. 67941".

3.5 Designated Service Area

i-wireless requests that the Commission designate it as an ETC for service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona, i-wireless states it will provide Lifeline service in many zip codes in the State of Arizona. Attachment 2 is a map of i-wireless' coverage area overlaid on the Commission's "State of Arizona Telephone with LATA" map. Attachment 3 is a list of each zip code served by i-wireless

There are a number of zip codes that encompass both tribal lands and non-tribal lands. Some of the tribal lands are served by tribal-owned telephone companies and some of the tribal lands are served by non-tribally owned telephone companies. i-wireless has asserted to Staff that it wants to provide Lifeline services to qualified customers who reside on non-tribal lands and those who reside on tribal lands served by non-tribally owned telephone companies. Based on the information provided by ALECA, there are three zip codes served by i-wireless that encompass tribal lands that are served by non-tribally owned telephone companies. For those zip codes that encompass tribal lands served by tribal-owned telephone companies, i-wireless requested to serve only the non-tribal areas of the zip code.

3.6 Reporting Requirement for Prepaid Wireless Deactivations

In addition to the FCC's requirements listed on page 2 of this recommendation, Staff recommends that i-wireless be required to provide a quarterly report of the number of customers

²¹ Response to Staff Data Request STF 2.19.

with periods of inactivity greater than 60 days, but did not cancel i-wireless, are no longer qualified for Lifeline service or who voluntarily deactivate service. The purpose of this report is to monitor the number of deactivated customers so that i-wireless does not continue to receive \$10.00 per handset for these customers every month from the Universal Service Administrative Company ("USAC"). The quarterly report must also include the total number of Lifeline customers and, as separate items, the number of customers who voluntarily relinquish their i-wireless provided Lifeline service, the number of customers who do not annually recertify their eligibility for Lifeline services and the number of customers deactivated for 60 days of inactivity.

4. INTERVENOR

4.1 ALECA

ALECA is an association of telephone companies and member-owned cooperatives providing local exchange telecommunications services to customers in rural, high cost areas of Arizona. All of ALECA's members are "rural telephone companies" as defined by the Communications Act of 1934, as amended (the "Act") 47 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, "Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each member also provides discounted Lifeline telephone service and receives compensation for the discounts from the FUSF." ALECA states it is concerned that i-wireless' offering may unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements to grow to the point where its member companies' FUSF compensation is endangered, and undermine public support for the FCC's universal service programs.

4.2 Joint Status Report

On March 18, 2011, i-wireless, ALECA and Staff filed a Status Report in the docket. In this Report, ALECA specified its concerns and i-wireless provided its response.

4.2(a) Access to 911 and E911

ALECA states that i-wireless customers should have access to 911 and E911. i-wireless addressed this concern by stating i-wireless Lifeline customers will have access to 911 and E911 just as i-wireless' existing customers have such access.

4.2(b) Arizona State Fees and Surcharges

ALECA states that i-wireless should remit certain fees to various state agencies, including the ACC assessment, the RUCO assessment, the Arizona Emergency Telecommunications Services Revolving Fund (911 fees), the Arizona Telecommunications Relay Service Fund and the Arizona USF Fund. This issue should be resolved in the same manner as the Commission resolved it for Tracfone Wireless in Decision No. 72222. i-wireless

responded by stating it intends to pay - and has been paying - such fees as required by Arizona law.

4.2(c) Tribal Lands

ALECA states that its tribal members are universally opposed to designation of i-wireless as an ETC on tribal reservations. Their position is that i-wireless should first apply for approval from each tribe and then take that approval to the FCC for designation. They believe that the ACC does not have jurisdiction on sovereign Indian Tribes lands, including granting ETC status to non-tribal telecommunications carriers on tribal lands. There is an association of tribal companies that wishes to be heard on jurisdiction and other concerns if the ACC considers approving this designation for tribal lands.

ALECA believes that this issue should be resolved in the same manner as the Commission resolved it for Tracfone Wireless in Decision No. 72222, where Tracfone agreed not to provide Lifeline service to eligible residents on tribal lands. To deal with zip codes that include reservation and non-reservation lands, i-wireless could use the 911 MSAG (Master Street Address Guide) maintained in each county/metro area, which contains only addresses outside the reservations. Locations not included in the MSAG would be presumed to be on a reservation, and not eligible for lifeline service from i-wireless.

i-wireless states it believes that the Commission has jurisdiction and authority to grant ETC status to non-tribal carriers for tribal lands. The Commission has done so in the past for Smith Bagley, Inc. in Decision Nos. 63269 and 63421. i-wireless continues to request ETC designation for the portion of its service areas that cover tribal lands.

4.3 Staff's Response to ALECA

In response to ALECA's concern that i-wireless' offering may unfairly duplicate the similar offerings of its member companies, Staff believes i-wireless' Lifeline service is not duplicative or similar to ALECA's member companies because i-wireless' Lifeline service is wireless, while ALECA members provide wireline service. Additionally, i-wireless' Lifeline services are different from that of ALECA members because it offers larger local calling areas, includes long distance calling without additional toll charges, provides the convenience and security afforded by mobile telephone service, is prepaid so customers can control their costs by purchasing in advance only the volumes of service which they need, and includes features (e.g., caller ID, call waiting, voice mail) which are not covered by ALECA members' Lifeline programs. In addition, designating i-wireless as a wireless ETC is consistent with competitive neutrality in advancing universal service policy. The FCC requires that universal service support mechanisms and rules should neither unfairly advantage nor disadvantage one provider over another and that they should neither unfairly favor nor disfavor one technology over another.²²

²² *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005), para 47.

To respond to ALECA's concern that i-wireless' ETC designation will cause the FUSF requirements to grow to the point where its member companies' FUSF compensation is endangered, and undermine public support for the FCC's universal service programs, Staff points out that i-wireless is only eligible for Lifeline USF and its designation as an ETC will not affect the ALECA members' high cost support.

Staff believes the Commission has jurisdiction and authority to grant ETC status. After conversations with representatives from the National Tribal Telecommunications Association ("NTTA") and Tribal Telecommunication providers, NTTA has requested Staff implement a new procedure for ETC Applicants seeking ETC designation on Tribal Lands. NTTA requests that when Staff receives an application, a formal letter be sent to the applicant company informing them if they are seeking to serve any tribal lands, that they must notify each specific tribal authority on whose lands they seek ETC designation of their pending Application at the Commission. Staff makes no recommendation on this request.

5. STAFF CONCERNS

Staff is concerned about i-wireless deducting minutes from Lifeline customers' handsets for calling i-wireless' Customer Service for those Lifeline customers choosing the 250 minute monthly option. When a Lifeline customer dials 611, i-wireless proposes to deduct minutes of use for calling Customer Service. Since the general practice of the major wireless carriers is to not deduct minutes for Customer Service calls, Staff recommends that i-wireless provide Lifeline customers choosing the 250 minute option free access to Customer Service.

6. STAFF RECOMMENDATIONS

47 U.S.C. § 214(e)(2) provides in part that a "State commission shall, upon its own motion or upon request, designate a common carrier that meets the requirements of paragraph (1)²³ as an eligible telecommunications carrier for a service area designated by the State commission." Staff recommends that the Commission grant i-wireless' Application for Designation as an Eligible Telecommunications Carrier under U.S.C. §214(e)(2) subject to the conditions discussed above.

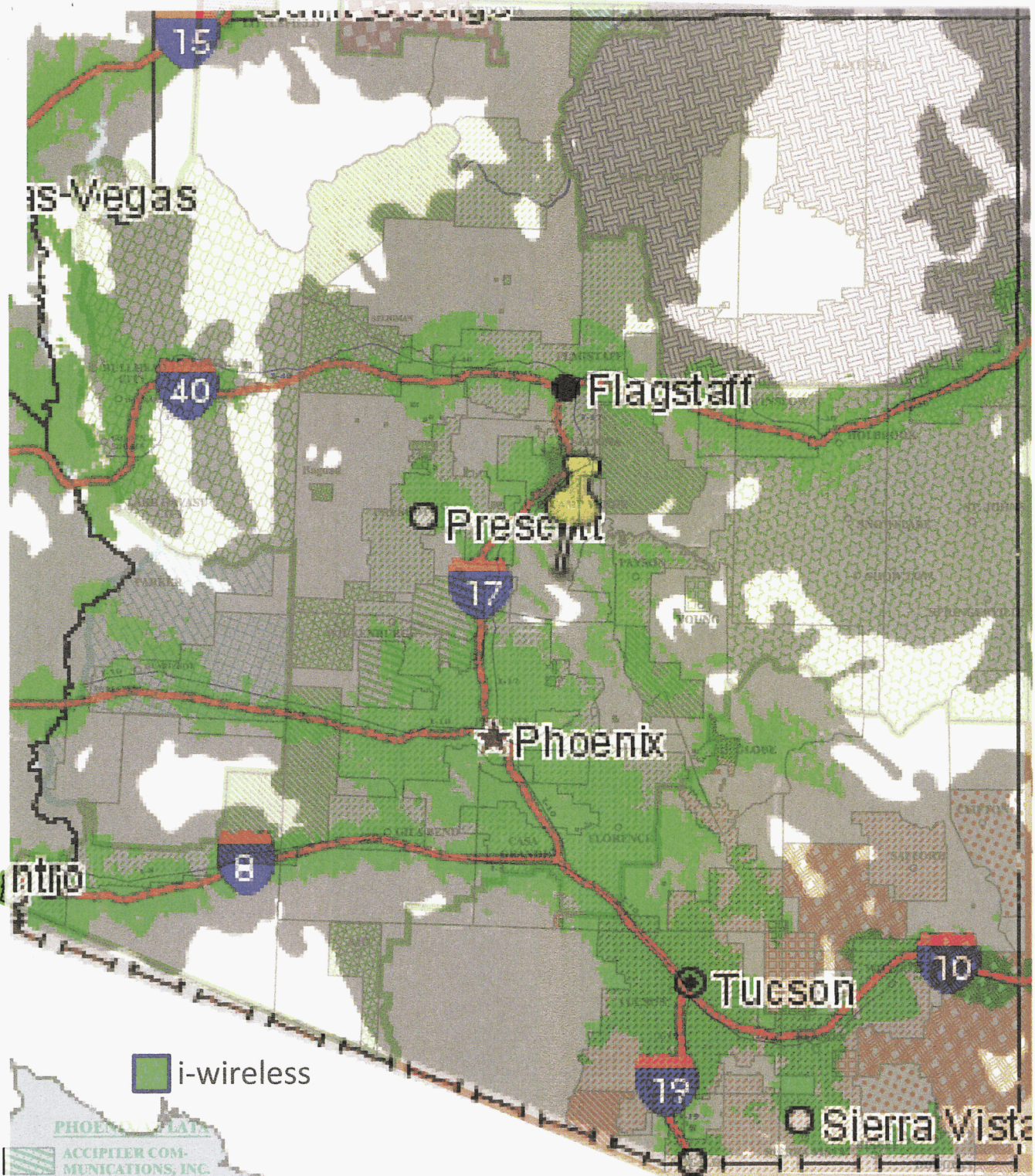
In addition to the conditions set forth by the FCC, Staff recommends i-wireless' Application for designation as an ETC be granted subject to the following conditions:

- a. i-wireless should provide Lifeline customers who choose the 250 minute plan free access to Customer Service from i-wireless handsets;
- b. i-wireless shall file a tariff with the Commission, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;

²³ 47 U.S.C. § 214(e)(1).

- c. i-wireless shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with ARS 40-367;
- d. i-wireless shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision and concurrently notify the Utilities Division Director, by making a filing in Docket Control, of the commencement date for such services;
- e. i-wireless shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control;
- f. i-wireless shall provide a regulatory contact to the Commission through Docket Control;
- g. In the event that i-wireless requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107.
- h. i-wireless shall submit an annual report by April 15th of each year, beginning April 15, 2012, that contains its total number of Lifeline subscribers, total amount of Federal USF support received and an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support per line. The annual filing shall be submitted as a compliance item in this docket; and
- i. That i-wireless submit a quarterly report detailing the total number of Lifeline customers, the total number of customers removed from the customer base due to 60-day inactivity, the number of customers removed from the customer base due to annual verification and the total number of customers who voluntarily relinquished Lifeline service. The quarterly report should be submitted as a compliance item in this docket on the 15th of the month following the end of each calendar quarter, beginning October 2011.


SAC	Legal Name of ILEC	Type	Monthly Support \$ Per Customer	Monthly Free Minutes Per Customer
452191	Accipiter Communications, Inc.	Rural	\$15.00	150
452171	Arizona Telephone Company	Rural	\$15.00	150
454426	Citizens Telecommunications Co. of the White Mountains, Inc.	Rural	\$15.00	150
452172	Citizens Utilities Rural Telephone Company, Inc.	Rural	\$15.00	150
452176	Copper Valley Telephone, Inc.	Rural	\$15.00	150
452226	Midvale Telephone Exchange, Inc.	Rural	\$15.00	150
454449	Navajo Communications Company, Inc.	Rural	\$15.00	150
		Tribal lands only	\$39.00	Unlimited Voice
455101	Qwest Corporation	Non-Rural	\$15.00	150
552356	Rio Virgin Telephone Co. Inc.	Rural	\$15.00	150
502286	South Central Utah Tel. Assn. Inc.	Rural	\$15.00	150
452174	Southwestern Telephone Company	Rural	\$15.00	150
453334	Table Top Telephone Co., Inc.	Rural	\$15.00	150
		Tribal lands only	\$39.00	Unlimited Voice
452176	Valley Telephone Cooperative, Inc.	Rural	\$15.00	150
452302	Verizon California, Inc.	Rural	\$15.00	150



 i-wireless

PHOENIX/LATA

 ACCIPITER COMMUNICATIONS, INC.

 ARIZONA TELEPHONE COMPANY

 FRONTIER CITIZENS UTILITIES RURAL

 FRONTIER COMMUNICATIONS OF THE WHITE MOUNTAINS

 MIDVALE TELEPHONE EXCHANGE, INC.


 TABLE TOP TELEPHONE COMPANY, INC.

 QWEST COMMUNICATIONS, INC.

TUCSON/AZ LATA

 ARIZONA TELEPHONE COMPANY


 COPPER VALLEY TELEPHONE, INC.

 MIDVALE TELEPHONE EXCHANGE, INC.

 QWEST COMMUNICATIONS, INC.

 VALLEY TELEPHONE COOPERATIVE, INC.

INDEPENDENT MARKET AREA

 NAVAJO COMMUNICATIONS COMPANY, INC.

SIERRA VISTA LATA

 BIG MOUNTAIN TELEPHONE COMPANY

 SOUTH CENTRAL UTAH TELEPHONE ASSOC., INC.

*Revised
June 27, 2007*

STATE OF ARIZONA TELEPHONE WITH LATA

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85001	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85002	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85003	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85004	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85005	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85006	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85007	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85008	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85009	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85010	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85011	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85012	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85013	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85014	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85015	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85016	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85017	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85018	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85019	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85020	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85021	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85022	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85023	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85024	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85025	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85026	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85027	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85028	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85029	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85030	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85031	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85032	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85033	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85034	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85035	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85036	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85037	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85038	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85040	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85041	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85044	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85045	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85046	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85048	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85050	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85051	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85053	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85054	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85055	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85060	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85061	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85062	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85063	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85064	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85065	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85066	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85067	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85068	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85069	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85070	Laveen	AZ	Phoenix_AZ	PHXGGR520	CASA GRANDE, AZ 520	
85071	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85122	Casa Grande	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85123	Arizona City	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85127	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85128	Coolidge	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85130	Casa Grande	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85131	Eloy	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85132	Florence	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85138	Maricopa	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85139	Maricopa	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85140	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85141	Eloy	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85142	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	CASA GRANDE, AZ 520	
85143	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85145	Red Rock	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85147	Chandler	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85172	Stanfield	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85178	Apache Junction	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85190	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85191	Coolidge	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85193	Casa Grande	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85194	Casa Grande	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85201	Mesa	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	
85202	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85203	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85204	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85205	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85206	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85207	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85208	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85209	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85210	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85211	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85212	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85221	Casa Grande	AZ	Phoenix_AZ	PHXGCR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85222	Casa Grande	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85223	Eloy	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	
85224	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85226	Chandler	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85228	Coolidge	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc./Tohono O'odh
85230	Casa Grande	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85231	Eloy	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	
85232	Florence	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85233	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85234	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85236	Higley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85238	Maticopa	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85239	Maticopa	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85240	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85241	Eloy	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	
85242	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85243	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85244	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85248	Chandler	AZ	Phoenix_AZ	PHXGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85249	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85250	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85251	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85252	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85253	Paradise Valley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85254	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85255	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85256	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85257	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85258	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85259	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85260	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85261	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85263	Rio Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85266	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85267	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85268	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85269	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85272	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85293	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85323	Avondale	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal_Lands_Covered
85333	Dateland	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85334	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85336	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85339	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85340	Litchfield Park	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85349	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85352	Wellton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85353	Tolleson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85358	Wickenburg	AZ	Phoenix_AZ	PHXWC8928	WICKENBURG, AZ 928	
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85360	Lake Havasu City	AZ	LakeHavasuCity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85387	Surprise	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85388	Surprise	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85392	Avondale	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85395	Goodyear	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85396	Buckeye	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85502	Globe	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85532	Miami	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85547	Payson	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85553	Payson	AZ	Phoenix_AZ	PHXPXH602	PHOENIX, AZ 602	
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85617	MC Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

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85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85743	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85744	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85745	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85746	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85747	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85748	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85749	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85750	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85751	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85752	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85754	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85755	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85756	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85757	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	

Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86333	Mayer	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520	
86335	Rimrock	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86339	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86340	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86341	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86342	Rimrock	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86351	Sedona	AZ	Flagstaff_AZ	NMXXSED520	SEDONA, AZ 520	
86402	Kingman	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86403	Lake Havasu City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86404	Lake Havasu City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86405	Lake Havasu City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86409	Kingman	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86412	Kingman	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86413	Golden Valley	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasucity_AZ	NMXXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86506	Ganado	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86511	Ganado	AZ	Farmingtion_NM	NMXXGLL505	GALLUP, NM 505	
86512	Chambers	AZ	Flagstaff_AZ	NMXXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86515	Ganado	AZ	Farmingtion_NM	NMXXGLL505	GALLUP, NM 505	Frontier/Navajo
86555	Douglas	AZ	SierraVista_AZ	NMXXBNS520	BENSON, AZ 520	